

## DOCKETED

<b>Docket Number:</b>	16-BSTD-01
<b>Project Title:</b>	2013 Compliance Option for Nonresidential Lighting Alterations
<b>TN #:</b>	208304
<b>Document Title:</b>	Notice of 60-Day Public Comment Period for Staff Analysis
<b>Description:</b>	Notice of 60-day Public Comment Period for Draft Staff Analysis of 2016 Nonresidential Lighting Alterations Alternatives for Demonstrating Compliance with the Existing 2013 Standards (CEC-400-2016-001-SD)
<b>Filer:</b>	Gabriel Taylor
<b>Organization:</b>	California Energy Commission
<b>Submitter Role:</b>	Commission Staff
<b>Submission Date:</b>	1/21/2016 1:51:56 PM
<b>Docketed Date:</b>	1/21/2016

## CALIFORNIA ENERGY COMMISSION

1516 NINTH STREET  
SACRAMENTO, CA 95814-5512  
www.energy.ca.gov



## Notice of Public Comment Period Docket No. 16-BSTD-01

### Staff Analysis of 2016 Nonresidential Lighting Alterations Alternatives for Demonstrating Compliance with the Existing 2013 Standards

California Energy Commission staff has prepared an analysis that considers, and proposes approval of, an alternative compliance path to allow the sections pertaining to Indoor Nonresidential Lighting Alterations in the *2016 Building Energy Efficiency Standards* (Standards) to be used as an option for showing compliance with the existing 2013 Standards. The Energy Commission is now providing this analysis and proposal in the form of a staff report for public review. The public comment period is 60 calendar days, starting from the posting of the proposal.

#### Purpose

On November 12, 2015, the Energy Commission adopted updates to Title 24, Part 6, sections relating to nonresidential lighting alterations (Sections 141.0(b)2I, J, K, and L). These updates included the addition of an optional compliance pathway to Sections 141.0(b)2Iii and Jii that allows projects to comply based on achieving a specified percent reduction in installed lighting power and meeting modified requirements for lighting controls. This optional compliance pathway was found to save as much or more energy as the 2013 requirements for nonresidential lighting alteration projects.

Energy Commission staff recommends that the Commission approve the alternate compliance path in the 2016 Standards as an alternative compliance approach for showing compliance with the 2013 Standards. The staff report demonstrates that the newly adopted lighting alterations language of the 2016 Standards Sections 141.0(b)2I and J, are collectively equivalent to, or more stringent than, the requirements of the 2013 Standards Section 141.0(b)2I, and therefore should be allowed to be used to comply with the 2013 Standards.

#### Background

The 2016 Standards include updates to sections specifying requirements for nonresidential lighting alteration projects. Stakeholders have expressed concerns that the 2013 Standards requirements imposed significant avoidable costs that provided little energy savings or consumer cost benefits. The 2016 Standards requirements adopted by the Energy Commission addressed these concerns by including an alternate

compliance path that avoids two of the larger costs (calculation of lighting power densities and wiring for bi-level lighting) while resulting in lighting systems that are as efficient or more efficient. Stakeholders have requested that the Commission consider ways in which the alternate compliance path could be made available as soon as possible.

The Energy Commission is directed by Public Resources Code Section 25402.1(b) and the 2013 Standards Section 10-109 to approve compliance options for products, materials, and calculation methods that show compliance when evidence supports the merits of the proposal. Once approved by the Commission, these new compliance alternatives may be used immediately to meet existing requirements, providing the public with an additional way to comply with the Standards. Staff therefore prepared a staff report analyzing the optional compliance pathway consistent with the Public Resources Code and the requests submitted by stakeholders.

### **Public Comments**

Written comments on the proposal should be submitted by 5:00 p.m. on March 21, 2016. If you wish to submit comments on the staff analysis, please submit them using the e-commenting feature on the Commission's webpage <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=16-BSTD-01>. A full name, email address, comment title, and either a comment or an attached document (.doc, .docx, or .pdf format) is mandatory. After a challenge response test used by the system to ensure that responses are generated by a human user and not a computer, click on the "Agree & Submit Your Comment" button to submit the comment to the Commission Dockets Unit.

You are encouraged to use the electronic filing system, described above, to submit comments. If you are unable to submit electronically, a paper copy of your comments, including the docket number 16-BSTD-01 and indicating "Staff Analysis of 2016 Nonresidential Lighting Alterations Alternatives for Demonstrating Compliance with the Existing 2013 Standards", may be sent to:

Docket Unit  
California Energy Commission  
Docket No. 16-BSTD-01  
1516 9th Street, MS-4  
Sacramento, CA 95814

Or email them to: [DOCKET@energy.ca.gov](mailto:DOCKET@energy.ca.gov)

Please note that your oral comments, e-Comments, e-mail, written letters, any attachments and associated contact information (e.g., your address, phone, and e-mail) become part of the viewable public record. Additionally, this information may become available via Google, Yahoo, and any other search engines.

## **Public Participation**

The Energy Commission's Public Adviser's Office provides the public assistance in participating in Energy Commission activities. If you want information on how to participate in this forum, please contact the Public Adviser, Alana Mathews, at (916) 654-4489 or toll free at (800) 822-6228, or by email at [PublicAdviser@energy.ca.gov](mailto:PublicAdviser@energy.ca.gov).

Please direct all news media inquiries to the Media and Public Communications Office at (916) 654-4989, or by email at [mediaoffice@energy.ca.gov](mailto:mediaoffice@energy.ca.gov).

If you have questions on the technical subject matter, please call Gabriel D. Taylor at (916) 654-4482.

The staff report and supporting materials can be downloaded here:  
[http://energy.ca.gov/title24/2008standards/special\\_case\\_appliance/](http://energy.ca.gov/title24/2008standards/special_case_appliance/).

January 21, 2016